

EXHIBIT D



Proskauer Rose LLP 1001 Pennsylvania Avenue, NW Suite 400 South Washington, DC 20004-2533

October 4, 2013

VIA EMAIL

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The Employment Law Group
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Re: Hosch v. BAE Systems Information Solutions, Inc.

Dear Mr. Carter:

I apologize that I was not able to respond to the remaining issues in your September 26 letter earlier this week. I have been balancing this week responding to various motions in other cases and the preparations for my sister's funeral next week.

Given its timing, I wanted to coordinate with you regarding the informal objection in the letter to our notice of inspection. To give us an opportunity to confer, we are willing to postpone the inspection for two weeks to Monday, October 21. I have attached a copy of a revised Notice with this new date. Please send me formal objections to the notice so that we can undertake the conferral process. I think that you will agree that we have good and appropriate grounds for requesting an inspection. Hopefully, we can work out an appropriate protocol for the inspection that will allow us to avoid a motion for protective order.

I will respond in separate correspondence to the remainder of the issues raised in your September 26 letter.

Thank you for your assistance with this matter.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Connie N. Bertram", with a large, stylized flourish at the end.

Enclosure

cc: R. Scott Oswald, Esq.

38948753v1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

CORNELIUS V. HOSCH,

Plaintiff,

V.

BAE SYSTEMS INFORMATION
SOLUTIONS INC.,

Defendant.

Case No: 1:13-cv-00825 AJT-TCB

DEFENDANT'S REVISED NOTICE OF INSPECTION

Please take note that, pursuant to Rule 34(a)(1) of the Federal Rules of Civil Procedure, Defendant BAE Systems Information Solutions Inc. (“BAE Systems”) will inspect Plaintiff Cornelius V. Hosch’s personal computers and electronic devices, located, upon information and belief, at 100 Daniel Efird Dr., Mount Holly, NC 28120-1463, beginning on Monday, October 21, 2013 at 9:30 a.m., or at such other location, date and time as the parties may otherwise agree. The inspection will be conducted during business hours and will proceed from day to day, weekends and federal holidays excluded, until completed.

The inspection will be conducted by Defendant's experts or consultants and may be attended by Plaintiff Hosch's counsel. The nature and scope of the inspection is described more fully in Exhibit A.

Dated: October 4, 2013, 2013

PROSKAUER ROSE LLP

A handwritten signature in black ink, appearing to be 'C. Bertram', written over a horizontal line.

Connie N. Bertram

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EXHIBIT A

DEFINITIONS

1. “Inspection” may include: inspection, measurement, surveying, photography, testing, copying and/or sampling of any designated object or operation on the personal computers and electronic and communications devices.

2. The terms “any,” “all,” “each,” “and,” “or,” and “and/or” as used herein shall be construed as appropriate to bring within the scope of these topics information and documents which might otherwise be considered to be beyond their scope.

3. “Plaintiff” or “Hosch” means Cornelius V. Hosch.

4. “Personal computers and electronic and communications devices” refers to any electronic device capable of receiving, processing, transmitting and/or storing data, including but not limited to any desktop computer, laptop computer, electronic tablet (e.g. iPad), communications devices (e.g. Blackberries, iPhones, Android devices, cell phones), and storage devices (e.g. thumb drives, CDs and external drives).

5. “BAE Systems” or “Defendant” refers to BAE Systems Information Solutions Inc. including any and all past or present officers, directors, partners, employees, agents, representatives, attorneys, accountants, advisors, consultants, divisions, subsidiaries, parents, affiliates, successors-in-interest, and/or predecessors.

6. “Claims and Defenses” means Plaintiff’s Complaint, Amended Complaint, and any further amendments thereto, and Defendant’s Answer to Plaintiff’s Complaint, Answer to Plaintiff’s Amended Complaint, and any amendments thereto or defenses raised therein.

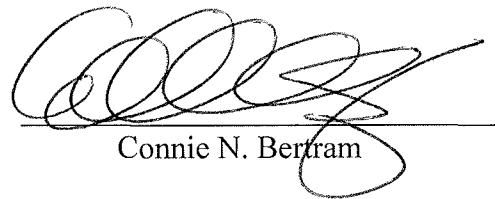
SCOPE OF INSPECTION

This Inspection is intended to provide BAE Systems with information pertaining to the Claims and Defenses, Plaintiff's removal, downloading, uploading, use, disclosure, retention and spoliation of documents and data of BAE Systems and unauthorized access to and use of the documents and data of BAE Systems. Therefore, the scope of the inspection is expected to encompass the following: creating a mirror image of and copying data from all of Plaintiff's personal computers and electronic and communications devices, identifying on the images (1) all non-privileged data relevant to the parties' Claims and Defenses; (2) all documents responsive to BAE Systems' written discovery requests; (3) Plaintiff's removal, downloading, uploading, use, disclosure, retention and spoliation of documents and data of BAE Systems and relevant or responsive documents by Plaintiff; and (4) any unauthorized access to or use of the databases and data of BAE Systems by Plaintiff.

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of October, 2013, I will cause the foregoing to be sent via electronic mail in .pdf format, to the following individuals:

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Connie N. Bertram